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| Docket Number: | 12-AFC-03 |
| Project Title: | Redondo Beach Energy Project |
| TN #: | 206095 |
| Document Title: | Statement in response to allegation by AES counsel regarding City's requests for noise data |
| Description: | N/A |
| Filer: | Jon Welner |
| Organization: | Jeffer Mangels Butler & Mitchell LLP |
| Submitter Role: | Intervenor Representative |
| Submission Date: | 9/14/2015 11:43:25 AM |
| Docketed Date: | 9/14/2015 |

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3 **STATE OF CALIFORNIA**
4 **California Energy Commission**

5 **In the Matter of:**

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7 **REDONDO BEACH ENERGY PROJECT**
8 **APPLICATION FOR CERTIFICATION**
9

Docket No. 12-AFC-03

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11 **INTERVENOR CITY OF REDONDO BEACH'S STATEMENT IN RESPONSE TO**
12 **ALLEGATION BY AES COUNSEL REGARDING CITY'S REQUESTS FOR NOISE DATA**
13

14
15 September 14, 2015
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Below is a side-by-side comparison of the data requested in the two tables:

| Data Requested in "Supplemental Brief Table" (September 10) | Data Requested in "Email Table" (June 18) |
|---|---|
| 1. All ambient noise measurement data for locations M3 and M4. | Provide all ambient noise measurement data for monitor locations M1, M2, M3, and M4. |
| 2. An electronic copy of the CADNA/A noise model file and AES' underlying assumptions. | Provide an electronic copy of the CADNA/A noise model file; all parameters that were input to the noise model; and all supporting calculations and data (with source documentation) used to establish the parameters. |
| 3. List of major equipment sound power levels used in the AES analysis, including elevation/height of noise-generating equipment. | [produced by AES on August 28] |
| 4. List of noise mitigation measures included in the AES noise model or analysis. | [produced by AES on August 28] |
| 5. Provide the calculations and data, with source documentation, used to develop the predicted operational noise levels. | Provide the calculations and data (with source documentation) used to develop the predicted operational noise levels. |
| 6. Provide the calculations and data, with source documentation equipment sound power levels, including octave and third-octave band levels, used to develop the noise contour map. | Provide the calculations and data (with source documentation) used to develop this noise contour map. |

It is immediately evident that none of the items listed in the Supplemental Brief Table are "new."¹ Rather, the Table is a list of the City's longstanding requests for data that are needed to properly analyze and understand the noise impacts of the proposed power plant on the neighboring communities in Redondo Beach and Hermosa Beach.

¹ The only item that could possibly be considered new is the inclusion of the phrase "equipment sound power levels, including octave and third-octave band levels" in the request for all calculations and data used to develop the noise contour map. But this is not a new request—it is merely pointing out a subset of the "calculations and data used to develop the noise contour map" that AES appears to have decided not to produce.

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DATED: September 14, 2015

JEFFER MANGELS BUTLER & MITCHELL LLP



By: _____
JON WELNER

Attorneys for Intervenor CITY OF REDONDO
BEACH

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